

Request for USAC Window Waiver

Proceeding: 02-6 (In the Matter of Schools and Libraries Universal Service Support Mechanism)

Filer (School or District): Archdiocese of Miami Schools

Billed Entity Number - Filer: 127728

Recipient of Services (School or District): St. John Neumann Catholic School

Billed Entity Number – Recipient of Services: 37004

Form 471 Application Number: 181042848

Date of Filing Form 471: Thursday, May 10, 2018

Description: The Miami, Florida area was affected by at least two hurricanes during the E-Rate filing season that disrupted normal operations. Moreover, due to the tragic incident at Marjorie Stoneman Douglas High School, many schools across the country and, more significantly, Florida schools, suffered a period of intense unease and uncertainty due to heightened security concerns, and this also disrupted normal operations at numerous Florida schools.

Numerous other circumstances such as major flaws with USAC's EPC Portal system and other issues prevented filers across the country from filing efficiently and timely, including:

- USAC's EPC Portal system was inaccessible to filers – and even to USAC's own personnel - for unexplained reasons for significant periods of time during the filing window;
- The USAC Category 2 Budget Tool(s) provided false data, to wit: the tool within the EPC portal system did not count 2015 funding, while the tool available outside EPC did not use updated enrollment in many cases;
- The EPC system was operating so slowly at critical times, including on the last day of the filing window, that efficient filing could not be accomplished;
- USAC failed to announce the inflation adjustments for Category 2 budgets until very late in the filing cycle, preventing filers from accurately calculating their budgets;
- Numerous areas of the country were affected by severe weather and natural disasters that prevented large numbers of filers from preparing timely filings, including at least two to three very large snowstorms in the northeast of the country, and severe wildfires in the western region of the country.

Please also note Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC (attached), describing issues and "serious flaws" with the EPC system at least as far back as a year ago. The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, ongoing IT failures throughout the 2017 and 2018 funding years, and other numerous problems evident in the USAC system and structure have prevented our filing of the proper Form 471 prior to the closing of the filing window.

We filed the Form 471 identified in the heading above, on the date identified above. Due to the above problems and many others, we ask that the FCC grant a waiver of the filing window so that the school can obtain funding pursuant to this Application.